



United States Attorney  
Southern District of New York

# MEMO ENDORSED

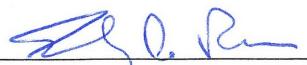
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 27, 2020

## BY ECF

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

The briefing schedule is approved.  
The Clerk of the Court is respectfully directed to terminate  
the motion, doc. 121.  
SO ORDERED.

  
Edgardo Ramos, U.S.D.J  
Dated: 4/29/2020  
New York, New York

**Re: *United States v. Anibal Gonzalez, a/k/a "Rafael Martinez," 13 Cr. 823 (ER)***

Dear Judge Ramos:

The Government writes, on behalf of the parties, pursuant to the Court's April 1, 2020 Order (Dkt. 122), to provide the Court with a joint status report regarding defendant Anibal Gonzalez's currently stayed motion pursuant to 28 U.S.C. § 2255 to vacate, set aside, or correct his sentence (the "2255 Motion").

Counsel for the defendant, Peggy Cross-Goldenberg, has discussed the 2255 Motion with her client, who wishes to proceed with the petition. The parties propose the following briefing schedule:

- June 1, 2020: Defendant's amended motion pursuant to 28 U.S.C. 2255, in light of (i) his request for counsel in connection with the motion, for the purpose of "present[ing] a more viable claim . . . and due to the complexity of issues" (Dkt. 105 at 18), and (ii) developments in the case law since the filing of the original motion.
- June 22, 2020: Government's response to the defendant's motion.
- July 6, 2020: Defendant's reply.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney  
Southern District of New York

By: /s/ Negar Tekeei  
Negar Tekeei  
Assistant United States Attorney  
(212) 637-2482

cc: Peggy Cross-Goldenberg  
*Counsel for Anibal Gonzalez*